

Lamont Jefferies
 2741 Carolina Blue Ave
 Henderson, NV 89052
 702-403-7115

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
OCT - 4 2019	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY:	DEPUTY

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA

LAMONT JEFFERIES,)	Case No. 2:19-cv-01501-KJD-EJY
Plaintiff,)	
)	
vs.)	Amended Complaint
)	
)	
Defendant.)	
)	
)	
)	

I interviewed to work for ConexWest because it was an job the most of the work was online with the CRM. Plus I had to make phone calls. It really was a tele-commute job. During my interview with the VP of Sales, I informed him of my disability as I do every employer, and his reply was, "that's okay, you're my guy. Thank you for your service". The VP of sales knew about the day off for the treatment and hired me later that day. After I went to training, got my desk, and online login codes I went home from training. The next time I was supposed to go to work was a Wednesday which is the day of the treatment. I sent a text to remind the VP that I would not be in. After several text messages he replied that he needs to schedule this long term. The next day I received an text message from the VP that I was fired because I could not come into the office five days a week. The job ad did not have anything about coming into the office five days a week. The VP during the interview also never said anything. So for them to fire me because I need the treatment for my disability was not fair. It made me very upset and hurt me and gave me financial worries because there was no job for me to help my family. I took my case to the EEOC and they setup a mediation, ConexWest didn't show and decided to call in from Europe. Also the person on the call couldn't make any decisions for the ConexWest. They didn't take it seriously. A lawyer for ConexWest submitted a letter to EEOC stating that I lied and never told the VP of Sales about my disability and that's how I got the job. That was a lie, because I have a text message from the VP of Sales stating that we was wrong and he should have asked more questions about my disability.

I'm seeking financial relief in the amount of \$600,000.00 from ConexWest for Wrongful Termination, and Disability Discrimination and Mental and Emotional Damage. As a disabled veteran I thought that it would be easy to get a new job and keep it, but ConexWest never gave me that chance. ConexWest doesn't have an employee handbook, which means they can make up the rules about their employees at will.

10-4-2019


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The Law Office of Andrew S. Cantor
4132 3rd St., Ste #7, San Francisco, CA 94124
phone: 415.817.1708; email:asc@cantor-law.com

US Equal Employment Opportunity Commission

April 1, 2019

Re: Statement of Position

Charge: 487-2018-01735

In Re: Lamont Jeffries

To Whom It May Concern:

Conexwest is in the business of the sales and rentals of shipping and storage containers. There are no official procedures or polices – the company does not have an employee handbook.

- 1) When Lamont Jeffries was hired on or about July 20, 2018, he failed to disclose his need for medical accommodations that would prevent him from coming into the Office 5-days a week;
- 2) A requirement for Sales Executives at Conexwest is that they come into the office 5-days a week;
- 3) All current and previous Sales Executives at Conexwest are/were in the office 5-days a week;
- 4) There was no way for Jeffries to adequately do his job if he was not at the Office for 5-days a week;
- 5) As soon as it was discovered that Jeffries would not be able to come into the Office as required, he was immediately discharged – this was approximately four days after he was hired. Mr. Jeffries was hired and discharged by Ruben Corona, VP of Sales for Conexwest;
- 6) No other Sales Executives have (or have had) the ability to work full-time and not be in the Office 5-days a week.

Please feel free to contact my office should you need any further information or clarification. I may be reached at 415-500-5849.

Andrew S. Cantor

Andrew S. Cantor
Attorney for Conexwest

DISMISSAL AND NOTICE OF RIGHTS

To: Lamont Jefferies
2741 Carolina Blue Ave
Henderson, NV 89052

From: Los Angeles District Office
255 E. Temple St. 4th Floor
Los Angeles, CA 90012



*On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))*

EEOC Charge No.

EEOC Representative

Telephone No.

487-2018-01735

Lina G. Williams,
Investigator

(213) 894-1436

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred **more than 2 years (3 years)** before you file suit may not be collectible.

Enclosures(s)

On behalf of the Commission


 Rosa M. Viramontes,
District Director


 5-29-19
 (Date Mailed)

cc:

Olesea Ursu
VP of Human Resources
CONEXWEST
801 Avenue H
San Francisco, CA 94103

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge within 90 days of the date you receive this Notice. Therefore, you should keep a record of this date. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed within 90 days of the date this Notice was mailed to you (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Courts often require that a copy of your charge must be attached to the complaint you file in court. If so, you should remove your birth date from the charge. Some courts will not accept your complaint where the charge includes a date of birth. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred more than 2 years (3 years) before you file suit may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit before 7/1/10 – not 12/1/10 – in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, please make your review request within 6 months of this Notice. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
255 E. Temple Street, 4th Floor
Los Angeles, CA 90012

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE \$300

LOS ANGELES
CA 90012
MAY 15
PM 131



ZIP 35205 \$ 000.50
02 4W
0000361441 MAY 30 2019

69052-385441



DEPARTMENT OF VETERANS AFFAIRS
810 Vermont Ave NW
Washington, D.C. 20420

October 04, 2019

Lamont Jermaine Jefferies
2741 Carolina Blue
Ave
Henderson, NV 89052

In Reply Refer to:
xxx-xx-5148
27/eBenefits

Dear Mr. Jefferies:

This letter is a summary of benefits you currently receive from the Department of Veterans Affairs (VA). We are providing this letter to disabled Veterans to use in applying for benefits such as state or local property or vehicle tax relief, civil service preference, to obtain housing entitlements, free or reduced state park annual memberships, or any other program or entitlement in which verification of VA benefits is required. Please safeguard this important document. This letter is considered an official record of your VA entitlement.

Our records contain the following information:

Personal Claim Information

Your VA claim number is: xxx-xx-5148

You are the Veteran.

Military Information

Your most recent, verified periods of service (up to three) include:

Branch of Service	Character of Service	Entered Active Duty	Released/Discharged
Marine Corps	Honorable	February 19, 1991	November 14, 1994

(There may be additional periods of service not listed above.)

VA Benefit Information

You have one or more service-connected disabilities:	Yes
Your combined service-connected evaluation is:	100%
You are considered to be totally and permanently disabled due solely to your service-connected disabilities:	Yes
The effective date of when you became totally and permanently disabled due to your service-connected disabilities:	January 18, 1997

You should contact your state or local office of Veterans' affairs for information on any tax, license, or fee-related benefits for which you may be eligible. State offices of Veterans' affairs are available at <http://www.va.gov/statedvva.htm>.

How You Can Contact Us

- If you need general information about benefits and eligibility, please visit us at <https://www.ebenefits.va.gov> or <http://www.va.gov>.
- Call us at 1-800-827-1000. If you use a Telecommunications Device for the Deaf (TDD), the number is 1-800-829-4833.

- Ask a question on the Internet at <https://iris.custhelp.va.gov>.

Sincerely,

Duane A. Honeycutt
Acting Executive Director
Benefits Assistance Service

